

**REMARKS**

In the Office Action, the Examiner subjected claims 1-51 to an election of species requirement. Specifically, the Examiner required the Applicant to elect one of the following species: Group I, claims 1-34 and 51; and Group II, claims 35-50. In addition, the Examiner noted that “[u]pon the allowance of a generic claim, applicant will be entitled to consideration of claims to additional species which are written in dependent form or otherwise include all the limitations of an allowed generic claim as provided by 37 CFR 1.141.” Office Action mailed on December 2, 2005, page 2. The Examiner indicated that at least claim 51 is considered to be generic. *See id.* at page 2.

In response to this election of species requirement, the Applicant elects the species corresponding to Group I *with traverse*. After careful review of the foregoing groups and the pending claims, the Applicant believes that the Examiner’s election of species requirement is improper and should be withdrawn. The Applicant submits that all of the independent claims 1, 16, 27, 31, 34, 35, and 51 are generic. The Examiner has not provided any reasoning for the two groups of species. Accordingly, the Applicant also believes that the dependent claims are generic. The Applicant recognizes that independent claim 35 recites a *plurality of machines*, but the Applicant does not believe that this recitation makes claims 35-50 a different species from claims 1-34 and 51. Therefore, the Applicant respectfully requests withdrawal of the foregoing election of species requirement.

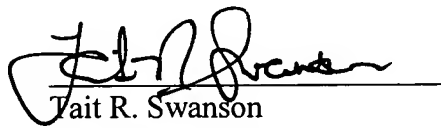
In addition, the Applicant objects to the Examiner’s election of species requirement on the ground of a lack of “serious burden” on the Examiner. As set forth in the Manual of Patent Examining Procedure, the criteria for an election requirement includes: (1) the inventions must be independent or distinct, and (2) there must be a serious burden on the Examiner. *See* M.P.E.P. (Rev. 3, August 2005) §§ 802.02 and 803. In this case, the Applicant stresses that the present claims evidence no burden, much less a “serious burden,” on the Examiner. If the Examiner reviews the claims and the disclosure, then the Applicant believes that the Examiner will agree that the pending claims can reasonably be examined without need for the foregoing election of

species requirement. Again, the Examiner has not even provided an appropriate explanation of the separate classification, or separate status in the art, or a different field of search as set forth in M.P.E.P. (Rev. 3, August 2005) § 808.02. The Applicant also emphasizes that “[p]iecemeal examination should be avoided as much as possible.” M.P.E.P. (Rev. 3, August 2005) § 707.07(g). For these reasons among others, the Applicant respectfully requests that the Examiner withdraw the election of species requirement and examine all pending claims.

If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,

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